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July 28, 2025

**VIA ECF**

The Honorable Andrew L. Carter, Jr.  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Paul Phillips, et. al. v. The City of New York, et. al., 21 Civ. 8149  
(ALC)(SLC)

Your Honor:

I am a Senior Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, representing defendants in the above referenced matter. In response to plaintiff's motion for oral argument on defendants' motion to dismiss (and to strike plaintiff's class allegations), defendants are not taking a formal position on whether or not there should be oral argument, but note that the numerous issues in the motions have been fully briefed by both sides (with excess pages). So, defendants do not see the necessity for oral argument and leave the issue to the Court's sound discretion.

Should the Court grant plaintiffs' request for oral argument, I will be on vacation from August 25, 2025, returning to the office on September 8, 2025.

Thank you for your consideration herein.

Respectfully submitted,

/s/ Mark D. Zuckerman  
Mark D. Zuckerman

cc: All counsel (via ECF)